

July 22, 2015

Curtis Caton
Forest Service - Tongass National Forest
Juneau Ranger District
8510 Mendenhall Loop Road
Juneau, AK 99801

Re: Comments on Environmental Assessment (EA) for Bulk Fuel Depot

Dear Mr. Caton,

Coeur Alaska appreciates the efforts of the Forest Service to prepare the Environmental Assessment (EA) for the proposed Bulk Fuel Depot and providing it for public comment. The following comments are to provide clarifications on the EA and are being submitted on behalf of Petro Marine and Coeur Alaska, Inc.

Existing Conditions Section:

- 1.) Iso-containers are delivered to site on a weekly basis. We suggest changing the word bi-weekly to weekly.
- 2.) Iso-containers are hauled on a flat-bed trailer that is pulled by a semi-truck. We suggest removing flatbed haul truck and replacing with flat-bed trailer that is pulled by a semi-truck.

Construction design features by number from the EA.

- 3.) Requirement #5: We assume that this requirement would be limited to construction operations at the fuel depot site, since it has not been applied at Kensington otherwise, but we don't think it is a necessary measure. Existing spill prevention and contingency measures, coupled with the construction design features specified in the EA, are sufficient to construct the fuel depot in a safe and environmentally protective manner.
- 4.) Requirement #10: The proposed tanks are dual walled which meet the regulatory requirement for secondary containment, thus no additional containment is necessary to be constructed around the fuel farm to meet the current secondary containment regulations. We suggest modifying this requirement by removing the words "fuel tank farm" from the requirement and leave marine header.

- 5.) Requirement #12: The current proposed location is situated on previously disturbed area of blasted rock and has been used for the staging and stacking of numerous shipping containers for several years, during which no issues of geotechnical instability have been observed. Thus, this requirement is unfounded and unnecessary.
- 6.) Requirement #17: The height of the proposed fuel depot tanks are less than the currently stored iso-containers height; thus the tanks will be less visible than the current storage situation.
- 7.) Requirement #18: See comment #6, no additional screening should be required because the fuel depot will be less visible than the current situation.

From the list of Fuel Depot Operation measures by number in the EA

- 8.) Requirement #3: Petro Marine currently delivers bulk fuel to several locations that are similar to the currently proposed fuel depot around Southeast Alaska including Glacier Bay and there is no requirement from the Coast Guard or Forest Service for deploying containment booms while refueling the depot at any of these locations. We request that the Forest Service delete this requirement as not necessary and overly cumbersome, unless the Forest Service can identify for us a regulation that specifically requires deployment of booms during refueling operations.
- 9.) Requirement #6: Please clarify this requirement. We presume that "for all personnel" means only those personnel who will be working at the fuel depot and does not include every person working at the mine. We suggest editing language to personnel that are working in and around the fuel depot.
- 10.) Requirement #9: Coeur Alaska and Petro Marine plan to use vehicle pipe protection ramps to allow light vehicles and the passenger crew bus to pass over the fuel line during fuel transfers, if needed. The ramps will prevent damage to the pipeline from vehicles during fuel transfer operations. We suggest modifying the requirement to include the use of vehicle pipe protection ramps.



Kevin Eppers
Environmental Manager

Coeur Alaska and Petro Marine appreciate the efforts of the Forest Service in preparing the EA and look forward to receiving the final version of the EA with related Decision Notice documents soon.

If you have any questions or concerns regarding these comments, please contact me at (907) 523-3328.

Sincerely,

A handwritten signature in black ink that reads "Kevin Eppers".

Kevin Eppers
Environmental Manager